



444 South 16th Street Mall  
Omaha NE 68102-2247

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October 19, 2012  
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**Via Certified Mail**

Tim Burns  
Air Division Administrator  
Omaha Air Quality  
5600 South 10<sup>th</sup> Street  
Omaha, NE 68107-3501

Subject: MATS Rule Compliance Date Extension Request for OPPD North Omaha  
Station Units 1 through 5

Dear Mr. Burns:

Enclosed is a request for a 1-year extension of the compliance date for the Utility Boiler Maximum Achievable Control Technology (MACT) rule, commonly referred to as the Mercury and Air Toxics Standard (MATS) rule. This compliance extension request is for Omaha Public Power District (OPPD) North Omaha Station Units 1 through 5. The information in the enclosed forms provides the basis for this request. OPPD is requesting written approval from the City of Omaha Office of Air Quality to extend the MATS compliance date for North Omaha Station Units 1 through 5 by one year to April 16, 2016.

The MATS rule has a compliance date of April 16, 2015. MACT rule general provisions found at 40 CFR 63.6(i) provide a mechanism for facilities to obtain a one-year extension of the compliance date from the permitting authority. The preamble to the final MATS rule indicates that EPA believes that the flexibility of permitting authorities to allow a fourth year for compliance should be available in a broad range of situations and the EPA MATS rule fact sheet indicates that they expect the option to provide a one-year extension to be broadly available.

While OPPD is still formulating a final MATS compliance strategy and identifying specific controls that will be required, the following table provides expected timeframes for steps needed to comply with the MATS rule.

Approximate Estimated MATS Compliance Timeline

Phase	Estimated start date	Estimated end date
Finalize MATS compliance strategy	Ongoing	December 2012
Preliminary design and specifications	December 2012	June 2013
Develop and issue Request For Proposal and award	June 2013	December 2013
Final design/procurement/fabrication	December 2013	February 2015
On-site construction/tie-in	February 2015	December 2015
Startup/testing/unit acceptance	December 2015	April 2016
Final compliance achieved		April 16, 2016

If further information or clarification is required, please contact Russ Baker at (402) 636-2316.



Russ J. Baker  
Manager - Environmental & Regulatory Affairs

Encl:

cc: EPA Region VII  
Angela Catalano



## Compliance Extension Request

Air Quality Control Division  
5600 South 10<sup>th</sup> Street  
Omaha NE 68107-3501  
Phone: (402) 444-6015  
Fax: (402) 444-3904

**Applicable Rule:** 40 CFR Part 63, Subpart A - National  
Emission Standards for Hazardous Air Pollutants  
(NESHAP) – General Provisions

*This form fulfills the requirements necessary to request an extension of compliance under 112(d) of the Clean Air Act (CAA) as specified in §63.6(i) and §63.9(c) of the Code of Federal Regulations (CFR). The deadline by which a request for an extension of compliance with a relevant standard must be received is **no later than 120 days before the compliance date of the standard** [as specified in §63.6(b) and (c)]. The amount of time requested for the extension request cannot exceed one (1) year.*

*\*Please note that emissions standards established under this part may specify an alternative date (e.g., other than 120 days) for the submittal of requests for an extension of compliance if alternatives are appropriate for the source categories affected by those standards. Please check the relevant standard for alternative submittal dates (§63.6(i)(4)(i)(B)).*

Company Name Omaha Public Power District	
Facility Name North Omaha Station	
Facility Physical Address 7475 Pershing Drive, Omaha, NE 68112	
Responsible Official Jon Hansen	Title Vice President – Energy Production and Marketing
Mailing Address (if different from facility address) 444 South 16 <sup>th</sup> Street, Omaha, NE 68102	
Telephone Number 402-636-2590	E-mail Address jthansen@oppd.com

**This form must be completed, signed and submitted to OAQC and EPA Region VII no later than 120 days prior to the compliance date of the standard.**

Omaha Air Quality Control  
5600 S 10<sup>th</sup> Street  
Omaha, NE 68107-3501

Region VII EPA  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101-2907

1. What is the relevant standard from which you are requesting a compliance extension and its compliance date (For example, NESHAP Subpart ZZZZ for Reciprocating Internal Combustion Engines, etc.)?

NESHAP Subpart UUUUU for Coal- and Oil-Fired Electric Utility Steam Generating Units

Compliance Date of the Standard: April 16, 2015

2. Identify the reasons why additional time is needed to comply with the standard:

Additional time is needed to conduct emission control technology testing, assess the appropriate emission control technologies or operational changes required to meet the Utility MACT limits, procure financing for the chosen controls or operational changes, hire contractors to design and install the needed controls or operational changes, obtain the appropriate permits needed for the facility changes, and actual installation or implementation of the chosen controls or operational changes, including startup, tuning, and establishing steady operations.

Provide the date (mm/dd/yy) when you first learned of the issues which led to this compliance extension request (§63.6(i)(4)(i)(C)): 02/16/12

3. What controls are being installed at your facility to ensure compliance with the relevant standard (§63.6(i)(6)(i)(A))?

The types of controls needed to comply with the standard are still being evaluated. It is expected that activated carbon or a similar sorbent injection technology will be needed to comply with the Hg limit. It is anticipated that some type of control or operational changes, such as dry sorbent injection or increased natural gas use, will be needed to comply with the acid gas limit.

4. Provide a compliance schedule by identifying which of the following activities will be initiated and/or completed and the expected dates of completion as a part of the process of achieving compliance with the applicable standard (§63.6(i)(6)(i)(B)(1)-(2)):

Activities	Part of your compliance process	Expected date of completion (mm/dd/yy)	Comments (Optional)
On-site construction	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<u>12/31/15</u>	_____
Installation of emission control equipment	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<u>12/31/15</u>	_____
Process change	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<u>04/16/16</u>	<u>A determination as to the exact changes needed has not been completed. However, increased use of natural gas may be a compliance option, with the possible need for changes to the gas supply pipeline</u>

5. Specify the date (mm/dd/yy) by which final compliance with the applicable standard is to be achieved (§63.6(i)(6)(i)(B)(2)): 04/16/16

6. Has your facility been issued an Air Quality Operating Permit? Yes ☒ No ☐

- If yes, what type of permit were you issued and what was the most recent date of issuance?

Class I Operating Permit?	Yes <input checked="" type="checkbox"/>	If yes, date issued (mm/dd/yy)?
	No <input type="checkbox"/>	<u>10/30/97</u>
Class II Operating Permit?	Yes <input type="checkbox"/>	If yes, date issued (mm/dd/yy)?
	No <input checked="" type="checkbox"/>	<u>      /      /      </u>

### Source Classification - Check the boxes that apply:

☒ Facility is a major source of hazardous air pollutants (HAPs).\*

☐ Facility is an area source of HAPs.\*

*\*Note: A major source is a facility that has a potential to emit greater than 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line.*

☒ Affected unit/source is classified as an existing source under the relevant standard.\*\*

☐ Affected unit/source is classified as a new source under the relevant standard.\*\*

*\*\*Note: To determine if your unit/source is new or existing, please consult the relevant standard or contact OAQC.*

### Certification

Print or type the name and title of the Responsible Official\* for the facility:

Name: Jon Hansen

Title: Vice President – Energy Production & Marketing

**I CERTIFY THAT INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.**

By signing this form, I am providing official notification that I am unable to comply with the relevant standard and require additional time for the reasons specified in this form (§63.6(i)(4)(i)(A)).



(Signature of Responsible Official)

9/25/12

(Date)

\*A Responsible Official can be:

- The president, vice president, secretary, or treasurer of the company that owns the plant;
- An owner of the plant;
- A plant engineer or supervisor of the plant;
- A government official, if the plant is owned by the Federal, State, City, or County government; or
- A ranking military officer, if the plant is located at a military base.